



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

Mail Code:
SR-6J

VIA ELECTRONIC MAIL

May 9, 2017

Mr. Keith M. Aragona. PE
Haley & Aldrich, Inc.
455 E. Eisenhower Parkway
Ann Arbor, MI 48108

Re: Pre-Design Investigation
North Bronson Former Facilities (NBFF) Site
Former Scott Fetzer Facility (NBFF OU3)
Bronson, Michigan

Dear Mr. Aragona:

In accordance with the June 2013 Administrative Order (Order) for Remedial Design and Remedial Action (RD/RA), Scott Fetzer Company (Respondent) must perform a remedial design described in the Record of Decision (ROD) for the North Bronson Former Scott Fetzer Facility Operable Unit 3 (NBFF OU3), and implement the design by performing a remedial action.

At this time, the United States Environmental Protection Agency (EPA) agrees to your proposed plan to design and implement, prior to Remedial Design Work Plan (RD WP) approval, a Pre-Design Investigation (PDI) that includes collection of current Site specific data regarding the nature and extent of contaminated soils and groundwater within the NBFF OU3 Site boundaries.

Pursuant to Section VII (Work to be Performed) of the Order, all work plans and other deliverables (i.e. PDI Work Plan) shall be submitted to the EPA and MDEQ for review and approval. Pursuant to Section IX (Additional Response Actions) of the Order, in the event the EPA determines that additional work or modifications to the Work are necessary to meet the ROD's Performance Standards, EPA will so notify the Respondent. The PDI's findings are expected to be useful in developing a RD WP in accordance with the ROD.

In accordance with the Statement of Work (SOW), the RD/RA shall consist of eight tasks including Task 1: RDWP, and Task 2A: Preliminary Design. The PDI's findings can be considered integral components of these tasks. The Respondent's Project Coordinator and EPA's RPM shall discuss any adjustments to the due date for any submission or activity involving

construction activities. The RD WP shall include, but not be limited to, preliminary design including results of any necessary field sampling and treatability studies. Additional data collection necessary for preparation of design documents will need approvals of PDI specific Field Sampling Plan (FSP) and Quality Assurance Project Plan (QAPP).

The following includes a proposed PDI schedule.

1. Submit PDI work plan to EPA within 60 days.
2. Mobilize to complete field work (depending on weather) within 60 days of receipt of EPA's final PDI work plan approval.
3. Submit PDI Summary report to EPA within 90 days of receipt of final laboratory reports from final field mobilization.
4. Submit revised RD WP to EPA within 60 days of receipt of EPA's PDI summary report approval.

The EPA concurs with this schedule, but expects the field work to be completed during calendar year 2017. If you have any questions regarding this letter, please feel free to contact me at (312) 886-6623 or by e-mail at maley.timothy@epa.gov.

Sincerely,



Timothy J. Maley PG
Remedial Project Manager

cc: (via e-mail)
Thomas Williams, Attorney, EPA
Timothy Prendiville, Section Chief, EPA
Timothy Fischer, Section Chief, EPA
Kathleen Meier, RPM, EPA
JD Campbell, P.E., Contractor, SulTRAC
Beth Mead O'Brien, MDEQ
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